

James J. Foster
Aaron S. Jacobs (CA No. 214953)
PRINCE LOBEL TYE LLP
One International Place, Suite 3700
Boston, MA 02110
617-456-8000
jfooster@princelobel.com
ajacobs@princelobel.com

Attorneys for Plaintiffs

MARK FOWLER (Bar No. 124235)
mark.fowler@us.dlapiper.com
CHRISTINE K. CORBETT (Bar No. 209128)
christine.corbett@us.dlapiper.com
SUMMER TORREZ (Bar No. 264858)
summer.torrez@us.dlapiper.com
JONATHAN HICKS (Bar No. 274634)
jonathan.hicks@us.dlapiper.com
DLA PIPER LLP (US)
2000 University Avenue
East Palo Alto, CA 94303-2214
Tel: 650.833.2000

Attorneys for Defendant,
APPLE INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNILOC 2017 LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

No. 3:19-cv-01697-VC

**JOINT RESPONSE TO ORDER RE STAY
OF CASE (DKT. NO. 118)**

Pursuant to the Court's March 9, 2020, Order re Stay of Case (Dkt. No. 118), Plaintiff Uniloc 2017 LLC ("Uniloc"), and Defendant Apple Inc. ("Apple"), the parties to this action, submit this joint response.

On March 11, 2020, Apple, along with Samsung Electronics America, Inc. and Motorola Mobility LLC, filed a Motion for Joinder of Microsoft Corporation's IPR2019-01471 (the "Microsoft IPR"), concurrently with a petition for *inter partes* review of U.S. Patent No. 6,836,654. *See* Exs. A (IPR petition) and B (Motion for Joinder). If the Patent Trial and Appeal Board grants Apple's Motion for Joinder, Apple will be subject to estoppel in accordance with 35 U.S. Code § 315(e)(2).

1 If Apple's Motion for Joinder is denied, Apple and Uniloc agree to jointly notify the Court
2 within seven (7) business days of such denial. If Apple's Motion for Joinder is granted, Apple's
3 position is that, in light of this Court's Order Re Stay of Case, a stay of this case is warranted through
4 final disposition of Microsoft's IPR, including all appeals.

5
6 Respectfully Submitted,

7 Dated: March 16, 2020

/s/ Aaron S. Jacobs

James J. Foster

Aaron S. Jacobs (CA No. 214953)

PRINCE LOBEL TYE LLP

One International Place, Suite 3700

Boston, MA 02110

617-456-8000

jfoster@princelobel.com

ajacobs@princelobel.com

Counsel for Plaintiffs

14
15 Dated: March 16, 2020

By: /s/ Christine K. Corbett

Mark D. Fowler

Christine K. Corbett

Summer Torrez

Jonathan Hicks

DLA Piper LLP (US)

2000 University Avenue

East Palo Alto, CA 94303-2214

Tel: 650.833.2000

Attorneys for Defendant

Apple Inc.